2 February 2023

To:

The Ministers of the Israeli Government

Greetings,

**Comments of the Society for the Protection of Nature on the Arrangements Law**

The Society for the Protection of Nature is honored to present its comments on the Arrangements Law, including amendments to the National Infrastructure Law as well as the structural changes draft to the 2023-2024 budget.

The Society for the Protection of Nature believes that despite the fact that the plan contains a number of positive clauses which we welcome, there are many environmentally problematic clauses that we propose should be deleted or amended in order to prevent harm to nature that would be caused by them.

At this time, when we all know that we are in the midst of two interrelated crises - the climate crisis and the ecological crisis - in a way that endangers the quality and well-being of life as well as its very existence, it is necessary not only to avoid promoting bills harmful to humans and to the environment, but also to march forward.

This document lists a number of proposals and ways of promoting environmental aims that will lead not only to an improvement in the quality of life in Israel, but also to the protection of the ecological systems as well as, in certain cases, to financial gain for the State of Israel. Unfortunately, these suggestions are missing from the present draft arrangements law.

We hope that the Israeli government will adopt our suggestions and amend its plans in order to prevent harm to the citizens of Israel, the Israeli environment and nature and adopt operative proposals to promote the quality of life and the environment in Israel while confronting the challenges at our doorstep.

Respectfully,

Iris Han

General Manager, SPNI

**Comments on the “Promotion of the National Infrastructure” Document**

**Determination of Preferred Essential Infrastructure Projects (P. 5)**

Clause 18: the construction of a supplementary airport is also included in the list of national infrastructure projects detailed in Government Decision No. 202, in light of previous government decisions which approved the construction of an airport at Ramat David. However, in a later government decision, numbered 547, from 24 October 2021, the decision on the construction of the supplementary airport at Ramat David was cancelled.

The construction of an international airport at Ramat David would entail enormous environmental hazards to the environment and agriculture in the Jezreel Valley, including a risk to millions of wild birds nesting and passing through the area. **In light of this, and in order to prevent a contradiction between the various government decisions, it is proposed that in the national infrastructure chapter, it should be explicitly mentioned that the national infrastructure project regarding the supplementary airport not be executed in Ramat David.**

**Forests (p. 7)**

Clause 24: the clause contains a list of considerations to be weighed by the forestry official, while ignoring the central factor which constitutes the basis of the Forestry Ordinance, namely the protection of the trees. **Therefore we propose including an additional factor explicitly indicated in the Forestry Ordinance: the age, scarcity, measurements, location as well as the scenic, environmental, ecological and historical value of the protected or mature tree for which the license is being requested.**

Clause 25: the section is worded in a way that *de facto* usurps the authority of a forestry official not to approve felling trees in preferred essential infrastructure projects and transfers the authority to the general manager of the Treasury and the general manager of the ministry in charge of infrastructure. This is extreme interference in the professional considerations of the forestry officer, which will lead with a high probability to a massive felling of trees even when this is not required to realize construction. **Therefore we propose that the section be deleted.**

**Planning and Licensing (P. 8)**

Clause 31(B): the clause seeks to annul the right of appeal against decisions of the district planning and construction committee and to determine them only as authorized by the chairman. The existing law balances the right of appeal and authority, so that in a small number of cases it is possible to appeal, and in most, permission must also be requested, and only in a small number of cases there is a right. The right is granted sparingly by the law, and in many cases where it is used, the appeal has led to necessary changes in the plan.

Preventing a right breaches the existing balance, while harming the right of the public to influence the planning processes, and (allegedly) in the name of efficiency, it creates a situation in which the public is excluded from planning which is to affect it. **Therefore, we propose deleting the clause.**

Clause 31(C): the clause proposes annulling the need to bring a national infrastructure plan and a detailed plan for national infrastructures and permits under the authority of the National Infrastructure Committee which have been proposed in the coastal environment before the Coastal Environment Protection Committee.

There are few such cases, but when a national infrastructure enters the coastal environment, it is appropriate that such a scarce resource be examined by the Coastal Environment Protection Committee, to which authority has been given to verify that there will be minimal harm to this sensitive environment. **It is therefore proposed to delete the clause.**

Clause 31(D): this is a most problematic clause that changes environmental consultation with planning committees from advice given by professionals in the Ministry of Environmental Protection to advice given by external private entities for pay that are not exposed to overall planning and are even liable to be in a state of conflict of interests. Below are our comments on the clause in detail:

1. In Clause 31(D)(1), it is proposed that the Planning and Construction Law be amended so that the environmental consultation of the committees (the National Council and the district committees) be replaced by an environmental consultant who is not an employee of the state in place of an employee of the Ministry of Environmental Protection.
2. In Clause 31(D)(2) it is proposed that the Planning and Construction Law be amended so that the survey is submitted to the new environmental consultant instead of the Ministry of Environmental Protection.
3. In Clause 31(D)(3) it is proposed that the Minister of the Interior amend the Planning and Construction Regulations in the matter of the survey of the impact on the environment according to the above-mentioned changes.
4. In Clause 31(D)(4) it is proposed that in the National Infrastructure Committee, it will be possible to appoint a consultant not from the list agreed by the Minister of Environmental Protection.

Up to now, the Ministry of Environmental Protection played a part in the determination of policy in the decision-making process, and there was a basis for the determination of environmental provisions in the planning process and in the determination of policy of the National Council and the planning system.

At present, Clause 31(D) in effect adopts and expands the working model of the National Infrastructure Committee and the National Committee for the Planning and Construction of Preferred Housing Complexes, which are committees that bypass the regular planning system and the aim of which is not to implement a planning policy, but rather to approve specific plans. This proposal opens a door to future conflicts of interests, since these are consultants working for the public sector while working for the private sector.

The lack of separation between the purely public interest and the interest of the environmental consultant, who is also supposed to serve promoters, is fertile ground for creating very serious damage to public health and the environment. Presently the pressure being applied by the planning institutions to promote plans quickly while waiving environmental considerations is already great, and so far the Ministry of Environmental Protection as a public entity has succeeded in standing firm despite the great challenge in the matter.

**What is now being proposed is that the private environmental consultation market become a closed market the members of which also prepare the environmental documents as well as writing the guidelines and examining these documents. This is a dramatic and destructive change in the field of planning which directly affects the ability to ensure the protection of environmental values in the planning and development processes in Israel.**

**If the environmental consultant is employed by the planning institution that is devoted to the promotion of the plan, the quality and level of environmental review will be harmed as well as the public interest. The need for advancement of accelerated steps to the satisfaction of the committee will overshadow a real environmental review which only an independent entity is able to provide.**

It should be pointed out that today as well, the environmental consultants of the National Infrastructure Committee and the National Committee for the Planning and Construction of Preferred Housing Complexes are greatly assisted by the environmental consultants of the Ministry of Environmental Protection regarding the determination of methodologies, regarding the significance of data and especially on very complex subjects for which it is difficult to reach planning decisions, thanks to the great expertise and experience of the consultants in the Ministry of Environmental Protection as well as their ability to see the overall picture beyond pinpoint planning.

**In light of the far-reaching environmental implications, it is proposed to delete the clause. In addition, it is proposed that the following matters be added to this chapter in the Arrangements Law:**

1. In order to make it possible to guard the health of the public and the environment, it will be determined that independent consultants acting on behalf of the state will prepare the environmental documents, and the financing will fall on the promoters of the plan, who will pay this into a fund dedicated for this purpose.
2. The environmental consultation of the planning institutions, the National Council and the district committees) will remain in the hands of the Ministry of Environmental Protection and not privatized.
3. The environmental consultation of the National Infrastructure Committee and the National Committee for the Planning and Construction of Preferred Housing Complexes will be transferred to the Ministry of Environmental Protection.
4. The budgets and the regulations required to ensure its ability to execute its task faithfully and within the required deadlines will be made available to the Ministry of Environmental Protection.

Clause 31(F): the clause in effect proposes to override the conditions required in the plan and the permit. In other words, the licensing authority may grant a permit and approval prior to the work, even if no approval has been given by an approving authority as this is defined in the above-mentioned law and even if no consent has been given by another authority, the consent of which is required as a precondition.

This situation will lead to a complication in the planning system, such that in new plans, the planning institution will be required to solve all the problems at the planning stage and not leave matters to the licensing stage, because it will not be possible to depend on this mechanism. Moreover, this is retroactive harm with significant impact in approved plans, since many of the plans have solved the issues through a requirement for consultation at the preliminary stage.

**Innovation (p. 10)**

Clause 36: in the clause, permitting the construction of pilot installations is proposed with a categoric exemption from a plan and a permit. Presently, about 120 pilot programs are being promoted for agro-PV installations by means of a detailed national outline plan (NOP). According to what is being proposed here, it will be possible to do this with an exemption from a plan and a permit, with no limitation and absolutely contrary to the Planning and Construction Law and the entire national planning policy formulated over many years. **This is an unusual and dangerous step with the potential for huge, negative impacts on the environment and humans, and therefore it is proposed to delete the clause.**

**Changes and Reliefs in Outline Plans or Existing Installations (p. 10)**

Clause 37: in this clause it is proposed to permit the construction of new transmission power lines (161 and 400) without any detailed plan, especially when they have been marked in a national outline plan. If this means NOP 41, which marked corridors for preservation, this is not a detailed plan. Moreover, during the preparation of the NOP, no examination of alternatives was carried out, as is done in the detailed plan.

At present, skipping this stage is being proposed as well as permitting power lines to be constructed without an examination of alternatives, without a survey of the impact on the environment, and in fact without a plan. This is a destructive step, particularly in light of the fact that in the coming years, hundreds of kilometers of power lines are to be promoted throughout the country. If this clause is approved, these lines will be promoted without the public having any possibility of influencing the planning. **Therefore we propose to delete the clause.**

Clause 39: the clause proposes changing long-standing practices regarding the process of changing the national infrastructure plan. Presently, a change may be made by means of a relief (in a limited way) or by means of a plan change for all intents and purposes. In contrast, it is proposed to make changes that are liable to be dramatic by means of a process similar to an easement which can amount to 10% of the area of the plan. In our opinion, it is unreasonable to make changes of this kind without a remedial plan. **The proposed clause in effect brutally shatters the rationale behind the institution of easements, and therefore we propose deleting it completely.**

**The Planning and Construction Regulations (p. 12)**

 Clause 44: in the clause, it is proposed to require the preparation for establishing a cellular installation on each roof with a size of 250 sq.m. or more. Despite the fact that we welcome the promotion of establishing cellular installations on roofs, the language of the clause is not sufficiently clear. **Therefore, we propose to state explicitly that the installation of photo-voltaic facilities be done on every new roof to be built in Israel as well as on existing structures.**

**Comments on the Document “Structural Changes Booklet for the 2023-2024 Budget”**

**Ensuring the Supplying of the Electricity Needs of the Israeli Economy**

We welcome the proposals to promote electricity generation by means of renewable energy. However, since land resources in Israel are acutely short, priority should be given to solutions that do not waste open areas such as ground solar, and instead prioritize solar energy on roofs. Below are comments to specific clauses:

Clause 7: in effect, the clause proposes imposing annual planning goals for ground cellular on the planning system, thus depriving it of its ability to determine planning policy, much less independence in deciding on plans on the subject. **We propose deleting the clause and alternatively determining that the examination of planning policy on ground cellular be given to the National Council, including examining the need of determining goals and limitations in regard to the scope of planning of ground cellular.**

Clause 8: the clause proposes excluding plans initiated by the government from the quota set by the National Council. However, the limitation of open areas in Israel does not depend on ownership or title to the land, and it is necessary to act most efficiently in using and allocating land for development, whether it is owned by the state or there are leasing rights. **Therefore we propose deleting Clause 8(A).**

**In addition, we propose deleting Clause 8(B), which seeks to annul the quota. Alternatively, it is proposed to determine that an examination will be carried out regarding the need for an updating of the quota as an alternative to its absolute annulment.**

Clause 9: this clause seeks to fix transaction and marketing objectives of land for cellular energy, while completely ignoring the abnormal density of Israel and the depletion of its land resources. **Therefore we propose that no such objectives be fixed, since the duty to preserve state lands and ensure their sustainable preservation and efficient utilization over time rests with the Israel Lands Authority.**

**Specifically, we propose deleting Clause 9(D), which seeks a marketing objective for land for ground cellular installations in the central regions, Tel Aviv and Jerusalem.** This is because in these regions in particular, there is an acute land shortage, and therefore the existing planning policy, which does not promote the marketing of land for ground solar in these regions, should be kept in place.

Clause 11: the clause proposes setting a price for land for each type of electricity-producing installation. However, the clause does not refer to the land in Israel being scarce. **It is proposed that the following sentence be added at the end of the clause: “In choosing the price of the land, the fact of its being scarce throughout the country should be taken into account and included in the price to be determined”.**

Clause 12: the clause proposes adopting the report of the inter-ministerial team on the subject of agro-solar by the Ministry of Finance. The team was to have dealt with the land issue in the matter, but broadened the canvas as well to planning topics which that handled in other frameworks. As a result, the Ministry of Finance team gave recommendations in purely planning issues not corresponding with the policy of the National Council on the one hand and with the directions proposed in the framework of the discussions of policy documents and the national outline plans being promoted at present regarding agro-solar installations.

At the present time, it is proposed to adopt the report despite its contradictions in regard to these issues and to attempt to impose its position on planning system bodies sitting on the bench. **In light of what is stated above, we propose not adopting the report as a government decision, but rather state that the planning issues will be determined in the framework of discussions on the policy documents and relevant national outline plans.**

 Clause 12(B): the clause proposes fixing a maximum quota for an agricultural settlement of 500 dunams of agro-solar installations in addition to 250 dunams of ground solar. This is a very large area which often amounts to 20% of the surface area of the entire agricultural allotment. This is a clearly inequitable allotment that discriminates against most of the residents of the state not entitled to make a living from producing solar energy. Moreover, environmentally this is a massive deployment of solar installations in open areas despite the shortage of land in Israel. **We propose deleting the clause.**

Clause 12(C): the clause proposes creating a path to building installations in the center, despite the fact that from a planning aspect, this cannot be done. This is “putting the cart before the horse”, since the planning discussion on the construction of installations in the central area has not yet been determined, where there are different attitudes regarding the justification of building these installations in a crowded area in which there is an acute shortage of land resources and it is subject to great competition between uses. **Therefore we propose deleting the clause.**

Clauses 13 and 15: the clauses state that the sanction on failure to comply with the terms of agricultural growth will be a reduction in the electricity rate paid for the production of solar energy. **We propose that the sanction be the dismantling of the installation and restoration of the agricultural activity, and not only a reduction in the rate.**

Clause 16: the clause in effect seeks to impose the principles of the Ministry of Finance on the National Council and on the planning system, as they are listed in the clause. This proposal harms the independence of the planning system and imposes considerations on it that are not those of planning. **Therefore we propose deleting this clause.**

Alternatively, we propose determining that the committee drawing up the national outline plan for agro-voltaic installations do so and bring its proposal before the National Council, which will decide in planning questions, including in regard to the principles, as is done regarding every national outline plan.

**In addition, it is proposed to add Clause 16A, which states that agro-PV installations will be done without fencing, which is not required for agricultural activity.**

Clause 17: the clause proposes removing the need to bring a plan of an agro-solar installation before the Committee for the Preservation of Agricultural Land and Open Areas. This is a completely unreasonable proposal, since the committee is the one whose job it is to ensure the protection of agricultural land, and it is precisely in this complex issue of an attempt to permit the production of solar energy beside agricultural activity that this committee has a structural advantage.

Moreover, the purpose of the committee is to ensure not only the protection of agricultural land, but also the protection of open areas and their functioning in general, and therefore in ensuring the protection of the additional environmental values of agricultural land as a part of the array of open areas, this committee has a special importance. Agro-solar projects are supposed to be one of the factors that in future will affect the greatest amount of total open areas, and therefore the committee has an even greater advantage from the aspect of these plans. **Therefore it is proposed not to exempt agro-solar plans from the hearings of the Committee for the Preservation of Agricultural Land and Open Areas.**

Clause 18: this clause in effect sends the promoters to sign contracts with titleholders of land for the promotion of production installations, which will lead to installations being promoted in the end on the basis of an affinity to the land, and not on the basis of the needs of the economy - not in scope, and mainly not in location.

Instead, there is a need for a national move of planning production needs and identification of locations, and if these locations are in the area of agricultural allotments, for example, expropriation is necessary, as is the need for the state to put them out to tender. Only in this way will it be possible to ensure that the installations being promoted are necessarily based on the needs of the economy and according to the required locations.

In addition, since a power station has many environmental impacts, such as air pollution, land use, etc., the Ministry of Environmental Protection must be included in the team. **Therefore it is proposed to delete the clause, and alternatively to amend it in accordance with what is stated above.**

Clause 21: the clause proposes to amend the Electricity Sector Law so that the policy principles determined by the Minster of Energy have the consent of the Minister of Finance. These principles are liable to have unusual environmental impact due to the effect on air quality, land consumption, scenic harm and ecological harm. **Therefore it is proposed to state that the principles are to be determined only with the consent of the Minister of Environmental Protection.**

**Water and Sewage (p. 12)**

Clause 4: we welcome the initiative to promote the field of the treatment of construction waste in Israel. However, in our view, the steps proposed in this clause are insufficient to deal with the problem. **Therefore we propose adding the following clauses:**

1. The amendment to the Law for Maintaining Cleanliness (Removal of Construction Waste), which passed the first reading in the Knesset in 2012 but since then its promotion has been stopped, will be promoted.
2. The existing exemption from receipt of a building permit for work that changes the surface of the land will be annulled, and it will be decided that any work that changes the surface of the land will require a building permit.
3. A statutory retirement of construction waste “pooling” sites will be carried out in order to overcome the time gaps in the use of material and in order to give a response to the need for the removal of the material.
4. The content of an integrated legal opinion of the Ministry of Environmental Protection, the Ministry of Justice, the Ministry of Agriculture and the Planning Administration which will clarify the local possibility of executing the removal of surplus soil to agricultural areas as well as the responsibility of the promoters and land owners for the soil surpluses removed in agricultural areas.

**Reduction of the Regulatory Burden in Fruit and Vegetables in Order to Reduce the Cost of Living (p. 22)**

The importing of food products, mainly vegetable matter, constitutes a most dangerous entry channel for invasive species into Israel. Invasive species[[1]](#footnote-1) are foreign fauna and flora that enter Israel, spread uncontrollably and cause great economic and social damage.

Even at present, the state of prevention of biological invasions into Israel is very poor[[2]](#footnote-2), and this has economic, health and environmental implications. In an age of climate change, the consequences of invasive species are even intensifying according to the leading international organization for nature conservation, the International Union for Conservation of Nature (IUCN); climate changes ease the spreading and establishment of many foreign species and reduce the resistance of natural habitats, agricultural systems and urban areas to climate changes[[3]](#footnote-3).

From an economic assessment carried out on the feasibility of treating invasive species by the Ministry of Agriculture, the Ministry of Environmental Protection and the Nature and Parks Authority, it appears that the annual cost of the damage done as a result of the invasion and establishment of invasive species could reach NIS 473 million[[4]](#footnote-4). In comparison, the annual cost of preventing the entry of these invasive species, a reduction in the scope of their establishment and their destruction was estimated at only NIS 35 million.

These data point to the economic desirability of giving preference to the handling and prevention of the entry of invasive species over the handling of the damage caused by them after the fact and that any preventive action will result in huge savings in future expenses.

 In contrast, the present proposal in the Arrangements Law is liable to negate the few environmental tests that are still being carried out in Israel by the plant protection services in the Ministry of Agriculture on imported agricultural produce, produce that constitutes a significant vector in the entry of invasive species. The proposal will cause economic, social, health and environmental costs which will be paid by all the citizens of Israel at present and in future. **Therefore we object to this chapter in the Arrangements Law and call for it to be deleted.**

Alternatively only, and without derogating from what is stated above, we propose that every application for a relief in the requirements of the importing terms and conditions be given not only with the approval of the Minister of Agriculture but also with the approval of the Minister of Environmental Protection, who will consult with the professional bodies in his ministry and receive their opinion regarding the environmental consequences liable to be caused as a result of approving the application.

**Promotion of the Urban Renewal Processes (P. 101)**

Clauses 1-5: We welcome these clauses, the aim of which is to launch the promotion of urban renewal plans in neighborhoods with single-story homes. These are urban spaces which demonstrate an inefficient use of the land, thus making it possible to promote the addition of hundreds of thousands of residential units without the creation of overcrowding.

Clause 6: the clause proposes an addition of residential units by way of a relief in ground-level lots without ensuring an efficient use of the land. Moreover, this type of single-story homes is found in suburban settlements, rural settlements and suburban neighborhoods, where the addition of a few residential units not by way of full urban renewal will lead to the need for an inefficient deployment of infrastructures and the encouragement of the use of private vehicles, worsening the transportation crisis. **Therefore we propose deleting the clause.**

**Increasing Economic Efficiency in the Tourism Sector (P. 121)**

Clause 7: the clause states that the Minister of Tourism instruct his representative in a planning institution how to vote, contrary to the existing guideline of the Attorney General, according to which the minister is prohibited from interfering with the independence of a representative in a planning institution in order to maintain the independence of the representative and permit him to make a decision on a professional basis only. **This is an illegal clause, and therefore we propose that it be deleted.**

**Green Licensing (P. 157)**

This chapter makes it possible to reduce the applicability of the Clean Air Act, 5768-2008 by imposing limitations on poison permits by law. This is to increase the certainty for permit applicants, while harming the environment and health of the public, which the Clean Air Act is intended to protect.

Clause 1: the proposal to determine that factories with a significant environmental impact will receive only one permit for a long period in accordance with the principles existing on the date the permit is given in the European Union negates the possibility of the regulator updating the permit from time to time according to new data revealed after the permit was given and even “freezes” the condition existing on the date the permit was given according to the European standard, which itself is liable to change over time. **Therefore it is proposed to delete the clause and allow the regulator flexibility to demand a number of permits for various periods according to need, with the aim of protecting the environment and public safety.**

Clause 1(B): the clause permits the applicant for the permit to make use of the old permit for one additional year only due to a delay in the giving of a decision in the application for renewal of the permit. **It is proposed to amend the clause so that the old permit remains in force only until the new permit is received, and not for one full year.**

Clause 1(D): as stated above, there is no point in binding the regulator and preventing him from updating the permit from time to time according to new findings which arise. Certainty for businesses should not overwhelmingly prevail over the public interest in protecting health and the environment. **It is proposed to delete the clause.**

Clause 1(F): this is interference in the discretion of the professional giving the license, **and therefore it is proposed to delete the clause**. Alternatively, we propose the following amendments:

Replace the words “If he believed that the terms of the permit” with “If he has proven that the terms of the permit”, since an appeal by the recipient of the permit against a professional decision must be based on evidence of significant harm in it rather than only on conjecture.

In the third line, the words “or portions thereof” will be deleted, since they effectively make every change almost unappealable, which is inconsistent with the basic rationale that the permit should not result in the closure of the business.

Add the words “The general manager of the ministry will request the expert opinion of the senior professional who issued the permit. If the general manager decides contrary to the opinion of the professional, as stated, this will be done from motives to be recorded and published in the framework of the publication of the permit” before the words “The general manager of the ministry will hold a consultation”. This is to verify that the decision is reached only after consultation with the senior level and that a deviation from his position will be only for special reasons. In addition, the amendment increases the transparency of the decision of the general manager if it is contrary to the position of the professionals in his ministry.

Clause 1(H): it is proposed to delete the word “significant”, which is subjective and is not defined in this clause; instead it should be stated that only changes that do not lead to any harm whatsoever will not necessitate changes in the permit.

Clause 1(J): in order to prevent duplication when permission to discharge sewage is required pursuant to the Water Law as well as pursuant to the Law for the Prevention of Sea Pollution, we propose stating that the granting of permission to discharge sewage to streams and other water sources be given in the same way in which permissions to discharge sewage to water are given, including the payment of a fee for each discharge, in order to reduce the incentive for a continuation of pollution beyond the minimal quantity required.

1. [http://www.polshim.org.il/%d7%9e%d7%94%d7%9d-%d7%9e%d7%99%d7%a0%d7%99%d7%9d-%d7%a4%d7%95%d7%9c%d7%a9%d7%99%d7%9d/](http://www.polshim.org.il/%D7%9E%D7%94%D7%9D-%D7%9E%D7%99%D7%A0%D7%99%D7%9D-%D7%A4%D7%95%D7%9C%D7%A9%D7%99%D7%9D/) [↑](#footnote-ref-1)
2. <http://www.polshim.org.il/wp-content/uploads/2017/01/IAS_Legal_framework_final2016_Nov16.pdf> [↑](#footnote-ref-2)
3. <https://www.iucn.org/resources/issues-briefs/invasive-alien-species-and-climate-change#:~:text=IAS%20are%20compounded%20by%20climate,urban%20areas%20to%20climate%20change>. [↑](#footnote-ref-3)
4. This data also appears in the report of the State Comptroller from May 2022 on the subject of invasive species:

<https://www.mevaker.gov.il/sites/DigitalLibrary/Documents/2022/2022.5/2022.5-211-Migvan-Biology-Taktzir.pdf> [↑](#footnote-ref-4)